

REMARKS

Claims 15-17 and 30-56 are pending. Claims 15-17 and 30-56 have been amended. No new matter has been introduced. Re-examination and reconsideration of this application is respectfully requested.

In the July 7, 2005 Office Action, the Examiner rejected claims 15-17 and 30-56 under 35 U.S.C. § 101 as being directed to non-statutory subject matter. The Examiner further rejected claims 15-17 and 30-56 under 35 U.S.C. § 112, first paragraph, stating that such a rejection is required if a 101 rejection is given. Accordingly, Applicants respectfully traverse the rejections in view of the claims as amended.

Claim 15, as amended now recites:

A system for indexing raw data from at least one data source based on a semantic temporal event included in the raw data, said system comprising:
a knowledge-based modeling unit for generating multiple-layer models for identifying said semantic temporal event;
a storage mechanism for storing said multiple-layer models;
an observation collection unit for extracting, from said raw data from the at least one data source, temporal observations according to said multiple-layer models;
a temporal event detection unit for detecting one or more occurrences of the semantic temporal event based on said temporal observations and said multiple-layer models; and
an indexing mechanism for generating an index for said raw data based on the semantic temporal events detected by the temporal event detection unit.

In the July 7 Office Action, the Examiner indicated that the claimed subject matter must disclose a practical application which produces a “useful, concrete and tangible result.” (*July 7 Office Action, pages 2 and 3*) Applicants have amended claim 15 to specify such a practical application. Specifically, claim 15, as amended calls for “A system for indexing raw data from at least one data source based on a semantic temporal event included in the raw data.” The system of claim 15, as amended produces a “useful, concrete and tangible result” in the form of

an index for said raw data based on detected semantic temporal events which improves the efficiency with which a user may retrieve of a particular segment of raw data.

The Examiner also found that “the claims are impermissibly abstract under 35 U.S.C. § 101 doctrine.” In doing so, the Examiner states that “Applicant manipulated a set of abstract “semantic temporal events” to solve purely algorithmic problems in the abstract.” Applicants respectfully submit that the term “semantic temporal events” is not merely an abstract idea. Rather, Applicants rely on the fundamental principle contained in 35 U.S.C. § 112 second paragraph, that “Applicants are their own lexicographers.” (*See MPEP § 112*) As provided in MPEP § 2173.01, Applicants “can define in the claims what they regard as their invention essentially in whatever terms they choose so long as any special meaning assigned to a term is clearly set forth in the specification.” Applicants note that the disclosure describes a “semantic event” as content embedded in media data, for example, a goal event in a soccer game. (*See Specification, pages 2-3*) Applicants respectfully submit that one skilled in the art at the time of the invention would therefore, understand that a “semantic temporal event” is a semantic event with a time component such as a sports event (i.e. a soccer game (*see claims 30-31 and 44-45*)). Accordingly, Applicants respectfully submit that independent claim 15, as amended is directed to statutory subject matter and the application is sufficient to enable one of ordinary skill in the art to practice the invention. Thus, Applicants respectfully request that the rejections be withdrawn.

Independent claim 43, as amended recites limitations similar to those of independent claim 15, as amended. Accordingly Applicants respectfully submit that claim 43 is directed to statutory subject matter for reasons similar to those set forth above with respect to claim 15, as amended.

Claims 16-17 and 30-42 depend from claim 15, as amended. Claims 44-56 depend from claim 43, as amended. Accordingly, Applicants respectfully submit that claims 16-17, 30-42, and 44-56 are directed to statutory subject matter for the same reasons set forth above with respect to claims 15 and 43, respectively.

Applicants believe that the foregoing amendments place the application in condition for allowance, and a favorable action is respectfully requested. If for any reason the Examiner finds the application other than in condition for allowance, the Examiner is requested to call the undersigned attorney at the Los Angeles telephone number (213) 488-7100 to discuss the steps necessary for placing the application in condition for allowance should the Examiner believe that such a telephone conference would advance prosecution of the application.

Respectfully submitted,

PILLSBURY WINTHROP SHAW PITTMAN LLP

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By: 

Roger R. Wise
Registration No. 31,204
Customer No. 27496

725 South Figueroa Street, Suite 2800
Los Angeles, CA 90017-5406
Telephone: (213) 488-7100
Facsimile: (213) 629-1033